

**UNITED STATES BANKRUPTCY COURT FOR
THE WESTERN DISTRICT OF WISCONSIN**

In Re:

**ISRAEL MCKINNEY
JENNIFER MCKINNEY**

In Bankruptcy No:

Debtor(s).

Case No: 22-11558(Chapter 13)

**OBJECTION TO THE MARINE CREDIT UNION MOTION FOR RELIEF FROM
STAY AND ABANDONMENT**

Israel and Jennifer McKinney, debtors by their attorneys, PITTMAN & PITTMAN LAW OFFICES, LLC by Greg P. Pittman, hereby objects to the Motion for Relief from the Automatic Stay and Abandonment filed by Marine Credit Union for the following reasons:

- 1) The real estate in question is the homestead of one of the Debtor's and the Debtors' dependents. The homestead is necessary for reorganization as the family homestead.
- 2) There is equity in the real estate above and beyond the mortgage balance owed to Marine Credit Union. The estimated value of the house is approx. \$450,000.00 and the approx. loan balance is \$310,000.00.
- 3) Debtors were previously set up on automatic payments and upon filing, Marine Credit Union stopped the automatic payments to prevent any issues or violations of the automatic stay. The Debtors were not initially aware that the automatic payments had stopped. Debtors have made recent efforts to work with Marine Credit Union to get these mortgage payments back on automatic withdrawals.
- 4) Debtors are in process of curing any post-petition default on the loan and anticipate that the loan will be current in the next 7-10 days.

Dated this 6th day of January, 2023 at La Crosse, Wisconsin.

PITTMAN & PITTMAN LAW OFFICES, LLC.

By: s/Greg P. Pittman
Greg P. Pittman
Attorney for Debtors
Attorney No. 1073787
712 Main Street
La Crosse, WI 54601
(608) 784-0841